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9 Attorneys for Plaintiff J.P. by and through his
Guardian *ad litem*, Shannon Villanueva
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11 UNITED STATES DISTRICT COURT

12 NORTHERN DISTRICT OF CALIFORNIA — OAKLAND

13 J.P., by and through his Guardian Ad Litem,
SHANNON VILLANUEVA,

Case No.: 4:17-cv-5679-YGR

14 Plaintiff,

**STIPULATION AND [PROPOSED]
ORDER CONTINUING TWO CASE-
MANAGEMENT DATES/DEADLINES**

15 v.

16 COUNTY OF ALAMEDA, DIANE DAVIS
17 MAAS, SUE MAY, TRIA FAMILY SERVICES,
MARIA REFUGIO MOORE, and Does 1-30
18 inclusive,

Complaint Filed: October 2, 2017
Trial Date: November 7, 2022

19 Defendants.

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DE VRIES LAW, P.C.
100 Pine Street, #1250
San Francisco, CA 94111

1 Plaintiffs J.P., by and through his Guardian Ad Litem, Shannon Villanueva (“Plaintiff”) and
2 Defendants COUNTY OF ALAMEDA and TRIAD FAMILY SERVICES (collectively
3 “Defendants”), jointly submit this Stipulation and [Proposed] Order.

4 Magistrate Judge Laurel Beeler conducted a Mandatory Settlement Conference on June 27,
5 2022 inviting the parties to consider a mediator's proposal with a deadline to respond of Thursday,
6 July 14, 2022. The parties now diligently and jointly request, based on good cause, that this Court
7 amend the scheduling orders to incorporate a brief continuance of two dates, as follows:

- (1) Extend the last day to disclose experts from July 25, 2022 to August 8, 2022; and,
- (2) Set the last day to file dispositive motions from July 14, 2022 to July 26, 2022 (with 35 days' notice), and, a hearing date of August 30, 2022.

IT IS SO STIPULATED AND REQUESTED.

Respectfully Submitted,
MATHENY SEARS LINKERT JAIME, LLP

By:

Date: June 29, 2022

/s/ Ronald E. Enabnit

Ronald E. Enabnit,
Attorney for Defendant
TRIAD FAMILY SERVICES

HAAPALA, THOMPSON & ABERN, LLP

By:

Date: June 29, 2022

/s/ Jody Struck

Jody Struck
Attorney for Defendants
COUNTY OF ALAMEDA,
DIANE DAVIS MAAS, AND SUE MAY

KESSLER LAW OFFICE

Date: June 29, 2022

By /s/ Darren J. Kessler

Darren J. Kessler
Attorney for Plaintiff J.P., by and through
his GAL, SHANNON VILLANUEVA

DE VRIES LAW, P.C.

Date: June 29, 2022

By: /s/ *Lizabeth N. de Vries*

Lizabeth N. de Vries
Attorney for Plaintiff J.P. by and through his
GAL, SHANNON VILLANUEVA

ELECTRONIC CASE FILING ATTESTATION

I, Lizabeth N. de Vries, am the ECF user whose identification and password are being used to file the foregoing documents. Pursuant to Civil Local rule 5.1(i), I hereby attest that concurrence in the filing of these documents has been obtained from each of its signatories.

DE VRIES LAW, P.C.

Date: June 29, 2022

By: /s/ *Lizabeth N. de Vries*

Lizabeth N. de Vries
Attorney for Plaintiff J.P. by and through his
GAL, SHANNON VILLANUEVA

1 **[PROPOSED] ORDER**

2 Having considered the stipulation of the parties and good cause appearing, the case-
3 management schedule is hereby amended as follows:

4 (1) The last day to disclose experts shall be extended from July 25, 2022 to August 8,
5 2022; and,

6 (2) The last day to file dispositive motions shall be continued from July 14, 2022 to
7 July 26, 2022 (with 35 days' notice), for hearing on August 30, 2022.

8 **IT IS SO ORDERED.**

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10 Date: July 5, 2022

11 
12 Honorable Yvonne Gonzalez Rogers
13 United States District Court Judge

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